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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

JOSEPH WALSH,

3:15-cv-01666 SI

PLAINTIFF,

v.

**DECLARATION OF KARLA
MOORE-LOVE**

**BRYANT ENGE, CHARLIE HALES,
CITY OF PORTLAND,**

**(In Support of Defendants' Motion for
Summary Judgment)**

DEFENDANTS.

I, Karla Moore-Love, declare as follows:

1. I am employed by the City of Portland as the Clerk to City Council. I have held this position since March 29, 2001.
2. Some of my responsibilities include overseeing the City Council meetings to maintain a journal of its proceedings, maintain a record of the Council's actions, and ensure that City Council documents are in compliance with applicable laws.
3. Either I or the Assistant Clerk are present in the City Council Chambers during City Council meetings.
4. I am familiar with Joseph Walsh.

5. In my experience and observation, Mr. Walsh frequently appears at City Council meetings to observe and to provide testimony.

6. In my experience and observation, Mr. Walsh has a history of being combative and disruptive during City Council meetings.

7. City Council meetings are conducted and recorded in accordance with ORS 192.630 and 192.650 and Portland City Code Chapter 3.02.

8. All City Council meetings are video-recorded and live-streamed on the internet and broadcast on public access channel 30 by a vendor, Portland Community Media (PCM). The video-recordings going back to 2003 are maintained for archival purposes forever. The most recent meetings are available on the City's webpage. The City has a process to move older videos to a YouTube channel, <https://www.youtube.com/channel/UCcPIUh7CWwtBXisMPHWG65g/playlists>.

9. Once the Council session is complete, YouTube automatically makes the video available for on demand viewing. The Bureau of Technology Services becomes the custodian of these recordings.

10. The audio portion of City Council meetings are available on the City Auditor's webpage through efiles. The City Auditor's Office is the custodian of these recordings.

11. The City Council meetings are also broadcast with live closed captioned text. The closed captions are provided through a vendor, LNS Captioning. I and other members of the Clerk's office review the closed caption and insert the correct names to the text. To create the official minutes the Clerk's office combines the Council Agenda Disposition with the reviewed closed caption file provided by LNS Captioning.

12. Beginning in early 2014, Mayor Hales began giving a brief admonishment at the beginning of the public testimony portion of City Council meetings reminding individuals observing and testifying that they were expected to observe basic decorum while in council

chambers. The basic decorum allows them to give a thumbs up or wave of the hand in support, but prohibits vocal demonstration that might interrupt or drown out testimony.

13. Attached to this Declaration as Exhibit A is a true and correct copy of excerpts from the City Council minutes for January 8-9, 2014.

14. Attached to this Declaration as Exhibit B is a true and correct copy of excerpts from the City Council meeting minutes for March 12, 2014.

15. Attached to this Declaration as Exhibit C is a true and correct copy of excerpts from the City Council meeting minutes for May 7, 2014.

16. Attached to this Declaration as Exhibit D is a true and correct copy of excerpts from the City Council meeting minutes for September 10, 2014.

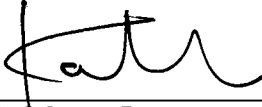
17. Attached to this Declaration as Exhibit E is a true and correct copy of excerpts from the City Council meeting minutes for May 13, 2015.

18. Attached to this Declaration as Exhibit F is a true and correct copy of excerpts from the City Council meeting minutes for July 8, 2015.

I make this declaration in support of Defendants' Motion for Summary Judgment.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: October 27, 2015.



Karla Moore-Love

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF KARLA MOORE-LOVE on:

Joseph F. Walsh
7348 SE Division Street
Portland, OR 97206
Plaintiff-Pro Se

on October 30, 2015, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said attorney, to be sent by the following method(s):

- ☒ by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by **hand delivery**.
- ☒ by **email** pursuant to LR 5-2(b).
- ☐ by **facsimile transmission**.
- ☐ by **email**.

Dan Simon

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